THE HONORABLE RICARDO S. MARTINEZ
Trial Date: August 16, 2021

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOHN M. KIVLIN,

Plaintiff.

No. 2:20-cv-00790 RSM

v.

CITY OF BELLEVUE, A municipal corporation, and PATRICK C. ARPIN, and CARL KLEINKNECHT, JOHN DOES NOES. 1 to 2 in their individual and official capacities,

STIPULATED MOTION FOR AND ORDER EXTENDING DEADLINE FOR EXPERT DISCLOSURES

[CLERK'S ACTION REQUIRED]

Defendants.

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff John Kivlin and Defendants City of Bellevue that the parties are currently engaged in concerted efforts to resolve this matter without further litigation if possible, particularly in light of changed circumstances in the underlying events. Counsel for the parties are engaged in ongoing negotiations and jointly request that the Court extend the current deadline for disclosure of expert witnesses and reports so the parties do not divert attention and resources to those efforts before determining if resolution is possible. The deadline for disclosure of experts and reports is currently February 17, 2021. Dkt. 8. The parties jointly request the court extend this deadline 45 days to March 30, 2021.

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Dated: February 17, 2021 1 2 PATRICIA S. ROSE EMPLOYMENT LAWYER 3 4 s/Patricia S. Rose 5 Patricia S. Rose, WSBA #19046 Attorney for Plaintiff 6 P.O. BOX 31892 Seattle, WA 98103 7 Telephone: (206) 622-8964 8 Facsimile: (206) 694-2695 Email: patty@pattyroselaw.com 9 10 11 Dated: February 17, 2021 12 13 KEATING, BUCKLIN & McCORMACK, INC., P.S. 14 15 /s/Jayne L. Freeman 16 Jayne L. Freeman, WSBA #24318 Attorneys for Defendants 17 801 Second Avenue, Suite 1210 Seattle, WA 98104 18 Ph.: (206) 623-8861 / FAX: (206) 223-9423 jfreeman@kbmlawyers.com 19 20 21 22 23 24 25 26 27 STIPULATED MOTION FOR AND ORDER EXTENDING KEATING, BUCKLIN & MCCORMACK, INC., P.S.

STIPULATED MOTION FOR AND ORDER EXTENDING DEADLINE FOR EXPERT DISCLOSURES - 2 2:20-cv-00790 RSM 1120-00010/Kivlin stip order ext ddl

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ORDER

PURSUANT TO THE FOREGOING STIPULATION, IT IS ORDERED that the deadline for disclosure of expert witnesses and reports is extended 45 days until March 30, 2021.

DATED this 18th day of February, 2021.

RICARDO S. MARTINEZ UNITED STATES DISTRICT JUDGE

KEATING, BUCKLIN & MCCORMACK, INC., P.S.